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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HOLLY MARIE WOOD, an individual,

Plaintiff,

vs.

CARL'S JR., d/b/a BTO INVESTMENTS, a
Delaware corporation; S.L. INVESTMENTS,
a Nevada corporation; CKE
RESTAURANTS, INC., a Delaware
corporation; CARL'S JR. RESTAURANTS
HOLDINGS, INC., a foreign corporation;
RUCEY MOLINA CRUZ, an individual;
DOES 1 through 10, inclusive; ROE
CORPORATIONS/ENTITIES 1 through 10,
inclusive,

Defendants.

Case No. 2:20-cv-2329-APG-BNW

**STIPULATION TO EXTEND
PLAINTIFF'S TIME TO RESPOND TO
S.L. INVESTMENTS' MOTION FOR
SANCTIONS**

Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court's approval, to permit Plaintiff additional time, to and until October 26, 2021, to respond to Defendant S.L. Investments, Inc.'s motion to sanctions.¹ Presently, Plaintiff's response is due today, October 19, 2021. This is Plaintiff's first request for an extension of time for the reasons cited herein.

¹ ECF No. 56 (filed October 5, 2021)

1 In support of this Stipulation, the parties agree to the following:

2 1. Good cause exists to support this request for additional time. Plaintiff's counsel
3 represent they have been working diligently on a response to the pending motion for sanctions
4 but due to recent circumstances will not be able to timely complete a response. Indeed, due to
5 time commitments involving other cases, undersigned counsel for Plaintiff (Paul S. Padda, the
6 attorney handling this specific motion for sanctions) has not been able to dedicate the time
7 necessary to completing and filing an appropriate response. During the past week, undersigned
8 counsel for Plaintiff has been required to propound discovery, respond to a dispositive motion,
9 and prepare for upcoming depositions in three separate matters. An additional week, however,
10 will provide undersigned counsel sufficient time to finalize and file a response to the pending
11 motion for sanctions.

12 2. Counsel for the respective parties have discussed this request for a short extension of
13 time and agree that an extension of time to and until October 26, 2021 is appropriate under the
14 circumstances.

15 The parties respectfully request the Court approve this Stipulation.

16
17 /s/ Rachel L. Wise

/s/ Paul S. Padda

18 Robert S. Larsen, Esq.
19 Rachel L. Wise, Esq.
20 Gordon Rees Scully Mansukhani, LLP

Paul S. Padda, Esq.
Tony Abbatangelo, Esq.
Paul Padda Law, PLLC

21 *Counsel for S.L. Investments*

Counsel for Plaintiff

22 Dated: October 19, 2021

Dated: October 19, 2021

23
24 **IT IS SO ORDERED:**

25 
26 **UNITED STATES DISTRICT JUDGE**

27
28 **DATED:** October 22, 2021